July 3, 2002

Mr. Jim Shafer
Covermaster, Inc.
57784 C. R. 3
Elkhart, IN 45617

Re: 039-16135
Second Administrative Amendment to
Part 70 039-7354-00137

Dear Mr. Shafer:

Covermaster, Inc. was issued a Part 70 permit on April 18, 2001, for the operation of a stationary fiberglass truck cap and component manufacturing source located at 57784 C. R. 3 South, Elkhart, Indiana. A letter requesting changes was received on June 24, 2002. The changes related to the relocation of pre-existing emission units to a new building located at 28706 Holiday Place Drive, which is adjacent to the present operation. According to 326 IAC 2-7-11(a)(8), an administrative amendment can be used for a change that "revises descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". The requested changes meet this requirement, therefore, pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows (~~strike-out~~ to show deletions and **bold** to show additions):

(1) The source address in Section A.1 is amended as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass truck cap and component manufacturing source.

Responsible Official:	Dillard Fletcher, President
Source Address:	57784 C.R. 3, Elkhart, Indiana 46517 **(Plants #1 and 2)** **28706 Holiday Place Drive, Elkhart, Indiana 46517 (Plant #3)**
Mailing Address:	57784 C.R. 3, Elkhart, Indiana 46517
SIC Code:	3799
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

(2) The facility description in Section A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices, which are separated listed under ~~two (2)~~ **three (3)** groups identified by the source as Plant #1 and Plant #2, corresponding to onsite production Buildings #1 and #2, ~~respectively,~~ **which are both located at 57784 C. R. 3, and Plant #3, which is located in an adjacent building at 28706 Holiday Place Drive**:

Plant #1 **(57784 C. R. 3)**:

(a) One (1) resin chop coat booth identified as B-1, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a non-atomized spray application system, exhausting at one (1) stack identified as SV-1.

(3) The mold repair unit is deleted from the facility description of Plant #2 in Section A.2 as follows:

Plant #2 **(57784 C. R. 3)**:

(a) One (1) paint booth constructed July 16, 1998, coating a maximum of 195 fiberglass truck caps per day, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) basecoat gun and one (1) clear coat gun and dry filter for particulate matter overspray control, and exhausting at two (2) stacks identified as SV-14 and SV-15.

~~(b) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with one (1) HVLP spray gun, one (1) non-atomized spray gun, and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.~~

(**b** c) One (1) production area constructed July 16, 1998, producing a maximum of 195 fiberglass truck caps per day and consisting of:

(4) The facility description of Plant #3 is added as follows to Section A.2:

Plant #3 (28706 Holiday Place Drive):

(a) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with one (1) HVLP spray gun, one (1) non-atomized spray gun, and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.

(5) The facility description is Section D.1 is amended as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Plant #1 **(57784 C. R. 3)**:

(a) One (1) resin chop coat booth identified as B-1, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a non-atomized spray application system, and exhausting at one (1) stack identified as SV-1.

(6) The facility description in Section D.3 is amended as follows:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

Plant #2 **(57784 C. R. 3)**:

(a) One (1) paint booth constructed July 16, 1998, coating a maximum of 195 fiberglass truck caps per day, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) basecoat gun and one (1) clear coat gun and dry filter for particulate matter overspray control, and exhausting at two (2) stacks identified as SV-14 and SV-15.

~~(b) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with one (1) HVLP spray gun, one (1) non-atomized spray gun, and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.~~

(**b** ~~c~~) One (1) production area constructed July 16, 1998, producing a maximum of 195 fiberglass truck caps per day and consisting of:

(1) One (1) chop booth equipped with one (1) flow coater chop gun exhausting at two (2) stacks identified as SV-1 and SV-2, and

(2) One (1) gel coat application booth equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, with dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-3.

(~~d~~ **c**) One Plant #2 Grind Booth for miscellaneous cutting and sanding operations for fiberglass and wood, constructed July 16, 1998, processing 730 pounds of product per hour, consisting of twelve (12) DA sanders, six (6) buffers, three (3) hand cutters, two (2) band saws, and two (2) table saws, exhausting at one (1) stack identified as SV-7.

Plant #3 (28706 Holiday Place Drive):

(d) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with one (1) HVLP spray gun, one (1) non-atomized spray gun, and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,
Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Covermaster, Inc.
57784 C.R. 3
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-7354-00137	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 18, 2001 Expiration Date: April 18, 2006

Significant Source Modification No.: 039-12770 Issuance Date: January 26, 2001
First Administrative Amendment No.: 039-15743 Issuance Date: April 11, 2002

Second Administrative Amendment No.: 039-16135	Pages Modified: 5, 6, 27, 39, 39a
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 3, 2002

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary fiberglass truck cap and component manufacturing source.

Responsible Official:	Dillard Fletcher, President
Source Address:	57784 C.R. 3, Elkhart, Indiana 46517 (Plants #1 and 2) 28706 Holiday Place Drive, Elkhart, Indiana 46517 (Plant #3)
Mailing Address:	57784 C.R. 3, Elkhart, Indiana 46517
SIC Code:	3799
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices, which are separated listed under three (3) groups identified by the source as Plant #1 and Plant #2, corresponding to onsite production Buildings #1 and #2, which are both located at 57784 C. R. 3, and Plant #3, which is located in an adjacent building at 28706 Holiday Place Drive::

Plant #1 (57784 C. R. 3):

(a) One (1) resin chop coat booth identified as B-1, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a non-atomized spray application system, exhausting at one (1) stack identified as SV-1.

(b) One (1) gel coat application booth identified as B-2, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-2.

(c) One (1) cut and grind booth identified as B-4, constructed October 11, 1995, processing 656 pounds of fiberglass product per hour, equipped with four (4) Torit dust collectors for particulate matter control respectively identified as GRDC-1, GRDC-2, GRDC-3 and GRDC-4, each exhausting inside the building.

(d) One (1) mold construction and rail assembly booth identified as B-5, constructed October 20, 1995, producing a maximum of 8.125 fiberglass units per hour and 1 mold per month, equipped with one (1) airless resin chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-5.

(e) One (1) spray paint booth identified as B-6, constructed October 20, 1995, coating a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) spray guns and dry filter for particulate matter overspray control, and exhausting at four (4) stacks collectively identified as SV-6.

(f) One (1) gel coat application booth identified as B-7, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-7.

(g) One (1) resin chop coat booth identified as B-8, producing a maximum of 10 fiberglass truck caps and parts per hour, equipped with one (1) flow coater chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-8.

(h) Two (2) product preparation booths, identified as Prep Booth B-1 and Prep Booth B-2, containing grinders, cutters and buffers and processing up to a total of 650 pounds of fiberglass product per hour, each equipped with a filter bank system for particulate matter control and exhausting inside the building.

Plant #2 (57784 C. R. 3):

(a) One (1) paint booth constructed July 16, 1998, coating a maximum of 195 fiberglass truck caps per day, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) basecoat gun and one (1) clear coat gun and dry filter for particulate matter overspray control, and exhausting at two (2) stacks identified as SV-14 and SV-15.

(b) One (1) production area constructed July 16, 1998, producing a maximum of 195 fiberglass truck caps per day and consisting of:

(1) One (1) chop booth equipped with one (1) flow coater chop gun exhausting at two (2) stacks identified as SV-1 and SV-2, and

(2) One (1) gel coat application booth equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, with dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-3.

(c) One Plant #2 Grind Booth for miscellaneous cutting and sanding operations for fiberglass and wood, constructed July 16, 1998, processing 730 pounds of product per hour, consisting of twelve (12) DA sanders, six (6) buffers, three (3) hand cutters, two (2) band saws, and two (2) table saws, exhausting at one (1) stack identified as SV-7.

Plant #3 (28706 Holiday Place Drive):

(a) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with one (1) HVLP spray gun, one (1) non-atomized spray gun, and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Plant #1 (57784 C. R. 3):

(a) One (1) resin chop coat booth identified as B-1, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a non-atomized spray application system, and exhausting at one (1) stack identified as SV-1.

(b) One (1) gel coat application booth identified as B-2, constructed October 11, 1995, producing a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-2.

(c) One (1) cut and grind booth identified as B-4, constructed October 11, 1995, processing 656 pounds of fiberglass product per hour, equipped with four (4) Torit dust collectors for particulate matter control respectively identified as GRDC-1, GRDC-2, GRDC-3 and GRDC-4, each exhausting inside the building.

(d) One (1) mold construction and rail assembly booth identified as B-5, constructed October 20, 1995, producing a maximum of 8.125 fiberglass units per hour and 1 mold per month, equipped with one (1) airless resin chop gun and dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-5.

(e) One (1) spray paint booth identified as B-6, constructed October 20, 1995, coating a maximum of 8.125 fiberglass units per hour, equipped with a high volume low pressure (HVLP) spray application system consisting of two (2) spray guns and dry filter for particulate matter overspray control, and exhausting at four (4) stacks collectively identified as SV-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 NESHAPs [326 IAC 20] [40 CFR Part 63]

Currently there are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR Part 63) applicable to this source. However, the United States Environmental Protection Agency (US EPA) has established the *Reinforced Plastic Composites Production* and the *Plastic Parts and Products (Surface Coating)* source categories as those requiring hazardous air pollutant control and has tentatively established August 2001 and December 2001 as the final rule promulgation dates, respectively. The source shall evaluate applicability to each rule upon its promulgation and shall comply with the applicable rules.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP-039-4510-00137, issued on October 11, 1995, compliance with 326 IAC 8-1-6 ((New Facilities: General Reduction Requirements) shall be achieved with the best available control technology (BACT) for chop coat booth B-1; gel coat booth B-2; mold construction booth B-5; and spray paint booth B-6, as follows:

(a) Utilize low styrene concentration in the resin used in chop coat booth B-1 and gel coat booth B-2;

(b) Utilize high quality resin and gel coat in mold construction booth B-5, also reduce the quantity of mold construction which would be one (1) mold construction per month;

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Plant #2 (57784 C. R. 3):

(a) One (1) paint booth constructed July 16, 1998, coating a maximum of 195 fiberglass truck caps per day, equipped with a high volume low pressure (HVLP) spray application system consisting of one (1) basecoat gun and one (1) clear coat gun and dry filter for particulate matter overspray control, and exhausting at two (2) stacks identified as SV-14 and SV-15.

(b) One (1) production area constructed July 16, 1998, producing a maximum of 195 fiberglass truck caps per day and consisting of:

(1) One (1) chop booth equipped with one (1) flow coater chop gun exhausting at two (2) stacks identified as SV-1 and SV-2, and

(2) One (1) gel coat application booth equipped with a high volume low pressure (HVLP) spray application system consisting of three (3) spray guns for color changes, using only one (1) gun at a time, with dry filter for particulate matter overspray control, and exhausting at one (1) stack identified as SV-3.

(c) One Plant #2 Grind Booth for miscellaneous cutting and sanding operations for fiberglass and wood, constructed July 16, 1998, processing 730 pounds of product per hour, consisting of twelve (12) DA sanders, six (6) buffers, three (3) hand cutters, two (2) band saws, and two (2) table saws, exhausting at one (1) stack identified as SV-7.

Plant #3 (28706 Holiday Place Drive):

(d) One (1) mold repair area consisting of three (3) fiberglass mold production booths, constructed July 16, 1998, producing a maximum of 12 molds per week, equipped with one (1) HVLP spray gun, one (1) non-atomized spray gun, and one (1) flow coater chop gun, with dry filter for particulate matter overspray control, and exhausting at three (3) stacks SV-16 through SV-18.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 NESHAPs [326 IAC 20] [40 CFR Part 63]

Currently there are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 20 and 40 CFR Part 63) applicable to this source. However, the United States Environmental Protection Agency (US EPA) has established the *Reinforced Plastic Composites Production* and the *Plastic Parts and Products (Surface Coating)* source categories as those requiring hazardous air pollutant control and has tentatively established August 2001 and December 2001 as the final rule promulgation dates, respectively. The source shall evaluate applicability to each rule upon its promulgation and shall comply with the applicable rules.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to CP-039-9337-00137, issued on July 15, 1998, the paint booth, mold repair area consisting of three (3) fiberglass mold production booths, and production area consisting of (1) chop booth and one (1) gel coat booth, are subject to the requirements of 326 IAC 8-1-6 ((New Facilities: General Reduction Requirements), which requires that the Best Available Control Technology (BACT) be used to control VOC emissions as follows:

(a) The total potential to emit (PTE) VOC from these facilities shall be less than 95.3 tons per twelve (12) consecutive month period. For the purpose of determining compliance with this limit, each ton of volatile organic hazardous air pollutant (HAP) emitted from resins and gel coats applied, as determined by the criteria set forth in D.3.2(a)(1) and (2), shall be considered a ton of VOC emitted.